MOT PHILIP J. TRENCHAK Nevada Bar No. 009924 Law Office of Philip J. Trenchak, Esq., P.C. 3531 East Russell Road, Suite H 3 Las Vegas, Nevada 89120 Ph: (702) 202-2009 Fx: (702) 202-2197 5 Email: pit@trenchaklaw.com Attorney for Patricia Bascom 6 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 11 12 UNITED STATES OF AMERICA, 13 Plaintiff, Case No. 2:10-cr-284-RLH-PAL-4 14 vs. 15 MOTION FOR AN EXTENSION OF TIME 16 PATRICIA BASCOM, 17 Defendants. 18 19 20 21 22 23 **MOTION FOR AN EXTENSION OF TIME** 24 25 PATRICIA ANN BASCOM (DEFENDANT) in the herein case comes by and through her 26 attorney of record, PHILIP J. TRENCHAK, Esq., and makes the following request for More Time to 27 answer. 28

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This Motion for an extension of time, is made and based on the papers and pleadings already submitted, and the facts and arguments set forth in this Motion. Dated this 5 day of March, 2012. RESPECTFULLY SUBMITTED BY: PHILIP J. TRENCHAK, ESQ. Nevada Bar #009924 3531 East Russell Road, Suite H Las Vegas, Nevada 89120 Ph: (702) 202-2009 Fx: (702) 202-2197 Email: pjt@Trenchaklaw.com Attorney for Patricia Bascom

I. INTRODUCTION

Judge Roger Hunt, on or about February 2, 2012 made an Order for Patricia Bascom to produce a list of pending files for four (4) weeks, and to explain the status of each case. As Alison McCurdy stated on Defendant's voice mail, Ms. McCurdy apparently called the Mortage Lending Division (MLD), and someone told her that this would be a difficult if not impossible feat to accomplish within the four (4) week s given.

II. APPLICABLE LAW AND LEGAL STANDARD

The MLD is governed by provisions found in the Nevada law. NRS 645A

III. FACTS AND ARGUMENT

The list that was produced at trial had the following names and addresses written onto it. That list is the following, which have updated each Escrow with added language beneath the address.

Escrow file: Escrow #1116

Address: 9100 Little Horse **\$1,000**

Las Vegas, Nevada

This Escrow has already been cancelled & disbursed.

Escrow File: Escrow #1112

Address: Garland Grove \$500

Las Vegas, NV 90110

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This is the only open file, Las Vegas Escrow is waiting on mutual disbursement instructions signed on how to disburse funds held in this Escrow File. A follow-up Email Status was sent to the listing Agent for status on when I would receive it.

Escrow file: #1117

Address: 1105 Fairchild Street \$1,500

Las Vegas, NV 89110

Escrow File: #10033

Address: 7221 Blizzard Lane \$1,000

Las Vegas, NV 89145

This file is cancelled and disbursed.

Ms. Bascom has wrapped up her business in an impressive amount of time according to what Alison McCurdy found out when she contacted the Mortgage and Lending Division. Ms. Bascom is trying desperately to wrap up her affairs before she has to surrender herself. She needs this time to figure out how to avoid her children becoming wards of the state as she is a single mom with no support coming.

V. CONCLUSION

For all the reasons above, and the fact is that only one (1) file remains which is about to be cancelled and disbursed awaiting signed disbursement instructions from the buyer. When that occurs, which could have already occurred, the Order from Judge Hunt will be satisfied. It will be a few days or a few minutes from now. But all pending files are now complete, all but this one just discussed.

Patti Bascom has attempted to follow the Order to a tee, and she missed this deadline only because of her attorney's error in not conveying this term properly. Ms. Bascom just has this small issue to eradicate, and everything will be exactly as Judge Hunt asked it to be. Escrow File: #10033, 7221 Blizzard Lane: \$1,000; Las Vegas, NV 89145.

All of these issues can be simply taken care of well within one (1) week. However, we apologize for any inconveniences we may have caused the court.

Respectfully submitted by:

PHILIP J. TRENCHAK, ESQ.

Nevada Bar #009924

Dated: <u>March</u> 5, 2012 3531 East Russell Road, Suite H

Las Vegas, Nevada 89120

Ph: (702) 202-2009 Fax: (702) 202-2197

Email: pjt@Trenchaklaw.com Attorney for Patricia Bascom

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1	PHILIP J. TRENCHAK	
2	Nevada Bar No. 009924	
,	Law Office of Philip J. Trenchak, Esq., P.C.	
3	3531 East Russell Road, Suite H	
4	Las Vegas, Nevada 89120 Ph: (702) 202-2009	
5	Fx: (702) 202-2009	
,	Email: pjt@trenchaklaw.com	
6	Attorney for Patricia Bascom	
7		
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
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ŀ	UNITED STATES OF AMERICA,	
12	orange strings of randacin,	
13	Plaintiff,	Case No. 2:10-cr-284-RLH-PAL-4
14	vs.	
15		
		ORDER
16	PATRICIA BASCOM,	
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	Defendants.	
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		<u>ORDER</u>
22	Dotti Ann Bossom, represented by her Atterney Philip I. Trenchelt, Ess. heg received on	
23	Patti Ann Bascom, represented by her Attorney Philip J. Trenchak, Esq. has received an	
24	Extension of Time, so that all pending files can be cancelled and disbursed. The new date to get this	
25	information surrendered to the Court will be March 12, 2012.	
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27		Lover L. Ham
İ		UNITED STATES DISTRICT JUDGE
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